

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Connect Devices, Inc.)
) File No. ITC-214-200208__-__
Application for Authority Under Section 214)
of the Communications Act of 1934, as Amended,)
to Provide Global Facilities-Based and Global)
Resale Service to All Permissible International Points)

APPLICATION

Connect Devices, Inc. (“CDi” or “Applicant”) hereby requests authority pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”),¹ and Section 63.18 of the rules of the Federal Communications Commission (“Commission” or “FCC”),² to provide global facilities-based service and global resale service (including switched resale, resale of private lines for private line service, and the resale of private lines for switched services) to all permissible international points. CDi also requests streamlined treatment of this application pursuant to Section 63.12 of the Commission’s rules.³

In support of CDi’s application, it submits the following information pursuant to Section 63.18 of the Commission’s rules:

¹ 47 U.S.C. § 214.

² 47 C.F.R. § 63.18.

³ 47 C.F.R. § 63.12.

- (a) Name, address and telephone number of Applicant:

Connect Devices, Inc.
16591 Noyes Avenue
Irvine, California 92606
telephone: 949-975-1222
fax: 949-975-1390

- (b) CDi is a corporation organized under the laws of the State of California.
- (c) Correspondence concerning this application should be sent to:

Albert C. Chen
Chairman and Chief Executive Officer
16591 Noyes Avenue
Irvine, California 92606
telephone: 949-975-1222
fax: 949-975-1390

with a copy to:

Cheryl A. Tritt, Esq.
Jennifer L. Kostyu, Esq.
Morrison & Foerster, LLP
2000 Pennsylvania Ave., N.W., Suite 5500
Washington, D.C. 20006
telephone: 202-887-1500
fax: 202-887-0763

- (d) CDi has not received a prior grant of authority under Section 214 of the Act.
- (e)(1) CDi requests Section 214 authority to operate as a facilities-based carrier pursuant to Section 63.18(e)(1) to all permissible international points and, by the attached certification, certifies that CDi will comply with the terms and conditions contained in §§ 63.21 and 63.22 of the Commission's rules.⁴
- (e)(2) CDi requests Section 214 authority to operate as a resale carrier pursuant to Section 63.18(e)(2) to all permissible international points and, by the attached certification,

⁴ 47 C.F.R. §§ 63.21, 63.22.

certifies that CDi will comply with the terms and conditions contained in §§ 63.21 and 63.23 of the Commission's rules.⁵

- (f) No response is necessary.
- (g) CDi is not seeking facilities-based authority under Section 63.18(e)(4) of the Commission's rules. Therefore, no response is necessary.
- (h) Safe-T-Guardian, Inc. ("Safe-T-Guardian"), a corporation organized under the laws of the State of California, located at 3972 Barranca Parkway, Suite J-288, Irvine, California, 92606, owns approximately a 51 percent direct and controlling interest in CDi. Safe-T-Guardian is an investment holding company. Mr. Albert Chen and Mrs. Regina Chen each holds a 50 percent interest in Safe-T-Guardian, respectively. Mr. and Mrs. Chen, husband and wife, are United States citizens and reside at 71 Eaglecreek, Irvine, California, 92618. Mr. Chen is Chairman and Chief Executive Officer and Ms. Chen is Chief Financial Officer of CDi. In addition, Mr. Jason Wang and Ms. Phoebe Fang each own approximately a 10 percent direct interest in CDi. Mr. Wang and Ms. Fang, husband and wife, are citizens of Taiwan and reside at 2233 Martin Street, #314, Irvine, California, 92612. Mr. Wang is President and Ms. Fang is Senior Sales Manager of CDi. Mr. and Mrs. Chen, Mr. Wang and Ms. Fang also currently hold positions at a California-based company that manufactures consumer power supplies.⁶ There are no other persons or entities who directly or

⁵ 47 C.F.R. §§ 63.21, 63.23.

⁶ Although CDi's shareholders are employees of CDi and the equipment manufacturer, the equipment manufacturer holds no ownership interest in CDi and is not connected or affiliated with CDi in any way.

indirectly own 10 percent or more of CDi. Furthermore, CDi has no interlocking directorates with a foreign carrier.

- (i) By the attached certification, CDi certifies that it neither is, nor is affiliated with, any foreign carrier.
- (j) By the attached certification, CDi certifies that it does not seek to provide international telecommunications services to any destination country for which: (1) CDi is a foreign carrier in that country; (2) CDi controls a foreign carrier in that country; (3) an entity that owns more than 25 percent of, or controls, CDi also controls a foreign carrier in that country; or (4) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of CDi and are parties to, or the beneficiaries of, a contractual relationship affecting the provision or marketing of international telecommunications services in the United States.
- (k) This section does not apply because CDi neither is, nor is affiliated with, a foreign carrier.
- (l) This section does not apply because CDi neither is, nor is affiliated with, a foreign carrier.
- (m) This section does not apply because CDi neither is, nor is affiliated with, a foreign carrier. Thus, CDi should be presumptively classified as non-dominant.
- (n) By the attached certification, CDi certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into any such agreements in the future.

- (o) By the attached certification, CDi certifies that no party to this application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) CDi seeks streamlined processing of this application under Section 63.12 of the Commission's rules because CDi: (1) is not, and is not affiliated with, any foreign carrier; (2) is not affiliated with a dominant U.S. carrier; and (3) does not seek authority to provide switched services over private lines to a country not previously approved by the Commission.

CONCLUSION

The Commission has recognized that increased competition in international markets is beneficial and that those markets will support additional carriers. Additional market entry will promote lower prices, innovative services, increased customer choice, and efficient utilization of telecommunications resources. CDi will support each of these goals through the provision of high-quality, competitive international communications services. Grant of CDi's application will therefore serve the public interest, convenience and necessity.

Respectfully submitted,

By: /s/
Cheryl A. Tritt
Jennifer L. Kostyu
MORRISON & FOERSTER LLP
2000 Pennsylvania Avenue, N.W.
Washington, D.C. 20006-1888
(202) 887-1500

Counsel to Connect Devices, Inc.

Date: August 1, 2002

CERTIFICATION

I, Albert C. Chen, Chairman and Chief Executive Officer of Connect Devices, Inc. (“CDi”), hereby certify that:

1. CDi will comply with the terms and conditions contained in Sections 63.21, 63.22 and 63.23 of the Commission’s rules.
2. Safe-T-Guardian, Inc. (“Safe-T-Guardian”), a corporation organized under the laws of the State of California, located at 3972 Barranca Parkway, Suite J-288, Irvine, California, 92606, owns approximately a 51 percent direct and controlling interest in CDi. Safe-T-Guardian is an investment holding company. Mr. Albert Chen and Mrs. Regina Chen each holds a 50 percent interest in Safe-T-Guardian, respectively. Mr. and Mrs. Chen, husband and wife, are United States citizens and reside at 71 Eaglecreek, Irvine, California, 92618. Mr. Chen is Chairman and Chief Executive Officer and Ms. Chen is Chief Financial Officer of CDi. In addition, Mr. Jason Wang and Ms. Phoebe Fang each own approximately a 10 percent direct interest in CDi. Mr. Wang and Ms. Fang, husband and wife, are citizens of Taiwan and reside at 2233 Martin Street, #314, Irvine, California, 92612. Mr. Wang is President and Ms. Fang is Senior Sales Manager of CDi. Mr. and Mrs. Chen, Mr. Wang and Ms. Fang also currently hold positions at a California-based company that manufactures consumer power supplies.¹ There are no other persons or entities who directly or

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indirectly own 10 percent or more of CDi. Furthermore, CDi has no interlocking directorates with a foreign carrier.

3. CDi neither is, nor is affiliated with, any foreign carrier.
4. CDi certifies that it does not seek to provide international telecommunications services to any destination country for which: (1) CDi is a foreign carrier in that country; (2) CDi controls a foreign carrier in that country; (3) an entity that owns more than 25 percent of, or controls, CDi also controls a foreign carrier in that country; or (4) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of CDi and are parties to, or the beneficiaries of, a contractual relationship affecting the provision or marketing of international telecommunications services in the United States.
5. CDi has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into any such agreements in the future.
6. No party to this application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

/s/

Albert C. Chen
Chairman and Chief Executive Officer
Connect Devices, Inc.

Date: August 1, 2002